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October 15, 2024

VIA ECF

Hon. Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Freeman et al. v. Giuliani, No. 24-mc-353 (LJL)

Dear Judge Liman,

Pursuant to Paragraphs I(C) and (D) of the Court's Individual Rules and Practices, Plaintiffs Ruby Freeman and Wandrea' Moss respectfully move for an extension of time to file their reply in support of the Motion to Enforce Judgment (ECF No. 8) to and including **October 22, 2024**. This is the first such request. Defendant Rudolph W. Giuliani consents to this request. Intervenor Andrew Giuliani consents to this request.

Plaintiffs' reply brief is currently due today, October 15, 2022. Plaintiffs are prepared to file their brief today. However, Plaintiffs and Defendant are discussing a proposal that may, if successful, moot any remaining disputes raised in Defendant's opposition to the Motion to Enforce Judgment. Plaintiffs believe that this short extension is likely to allow them to determine whether any such agreement is possible. Under the circumstances, Plaintiffs are willing to defer the completion of briefing on the Motion to Enforce Judgment for this short, limited period. Plaintiffs will file their reply brief as soon as it is apparent that no such agreement is possible, and in any event no later than October 22, 2024.

Respectfully submitted,

s/ Aaron E. Nathan